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Attorney for Claimant  
ILIJA MATUSKO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin  
Gold (BTG), Bitcoin SV (BSV), and Bitcoin  
Cash (BCH) seized from  
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

Defendant.

ILIJA MATUSKO,

Claimant.

Case No. CV 20-7811 RS

**DECLARATION OF ILIJA MATUSKO IN  
SUPPORT OF CLAIMANT'S  
OPPOSITION TO MOTION TO STRIKE  
THE VERIFIED CLAIM OF ILIJA  
MATUSKO**

Date: September 30, 2021  
Time: 1:30 pm  
Cttrm: 3 (Via Zoom)

The Hon. Richard Seeborg

Trial Date: None Set

**DECLARATION OF ILIJA MATUSKO**

I, ILIJA MATUSKO, declare as follows:

1. I am a citizen of the Federal Republic of Germany (Germany) and have been since my birth in 1980. I have continuously resided in Germany. My primary language is German. I do have some proficiency in English.

2. I was educated in Germany and I received a degree from a University in Munich in sociology. I have no education, training, or experience as it relates to law in Germany. I have no

1 education, training, or experience as it relates to U.S. laws. I do not know what rights U.S.  
2 citizens have as it relates to U.S. laws and the seizure of assets. I do not know what rights, if any,  
3 a German citizen would have as it relates to U.S. laws and the seizure of assets.

4 3. In December of 2011 I was unemployed, and I was receiving a form of  
5 unemployment compensation from the government of €719 per month as I was seeking a full time  
6 job. In mid-2012 I was hired by a communication firm in Berlin as a content editor. In 2014 I  
7 was offered and accepted a position with the newspaper publication company "taz". I was hired  
8 as an online content editor and over the past few years I have been assigned as the content editor  
9 for the taz crowdfunding model. With my interest in Bitcoin I became involved in the integration  
10 of Bitcoin as a payment option for "taz"<sup>1</sup>.

11 4. Recently, I started writing and my last paper was on "class and social injustice."

12 5. In approximately 2011, I learned of an alternative digital currency that was  
13 decentralized, with no central bank, and that the digital currency may provide some anonymity.  
14 This alternative virtual currency was Bitcoin. The concept of anonymity intrigued me.

15 6. During the latter part of 2011, I learned about the Silk Road Market from a friend.

16 7. In approximately December of 2011, I accessed the Silk Road Market and created  
17 a new user account under the username of "hanson5". I clicked on an area in the Silk Road  
18 Marketplace user interface and a Bitcoin address was provided to me on the screen so I could  
19 send Bitcoin to the Silk Road Marketplace.

20 8. In December of 2011, I purchased 48 Bitcoin from a third party for €150 Euros.  
21 The third party sent 48 Bitcoin to the Bitcoin address to my Bitcoin wallet that I provided to him.  
22 Upon receipt of the 48 Bitcoin to my Bitcoin wallet, I sent the 48 Bitcoin to the Bitcoin address  
23 that was provided to me by the Silk Road Marketplace when I opened the "hanson5" user  
24 account. Within a few days I saw that the 48 Bitcoin were credited to my "hanson5" user account.

25 9. After viewing the Silk Road Marketplace, I decided against buying anything. I  
26 didn't want to be involved in something illegal. At no time did I purchase anything, legal or  
27 illegal, on the Silk Road Marketplace.

28 <sup>1</sup> <https://taz.de/Zahlen-per-Bitcoins/!142454/> -2-



1           10.     Sometime later I realized that I had forgotten my password to my "hanson5" user  
2 account and that I no longer had access to my account.

3           11.     Sometime in 2013, I heard that the platform was taken down by the FBI.

4           12.     At no time was I aware of my rights to recover my 48 Bitcoin from the FBI.

5           13.     At no time did I receive any notification from the FBI or the U.S. government as to  
6 my rights to recover my 48 Bitcoin.

7           14.     In early 2021, a friend convinced me that I should talk to an attorney and this  
8 friend introduced me to Tom Westermann who is a German attorney. I spoke with Mr.  
9 Westermann to see if there is a way to get my 48 Bitcoin back.

10          15.     Even Mr. Westermann was not aware of U.S. seizure laws and the rights that  
11 German individuals have to recover these assets. Tom contacted several law firms in the U.S. and  
12 in May of 2021, I retained Kugelman Law.

13          16.     The first time that I heard of the seizure of approximately 69,370 Bitcoin was  
14 when Alex Kugelman told me about it on June 8, 2021.

15          17.     I declare under penalty of perjury under the laws of the United States of America  
16 that the foregoing is true and correct.

17                 Executed on this 26 day of August 2021, at Berlin, Germany.

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ILIJ MATUSKO  
Claimant